



September 22<sup>nd</sup>, 2021

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Re: Docket No. 2021-88-E – Dominion Energy South Carolina, Incorporated’s 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)

Dear Ms. Boyd:

London Economics International LLC (“LEI”), as the third party consultant in the above referenced proceeding, submits this letter in opposition to the Carolinas Clean Energy Business Association (“CCEBA”)’s Motion for the Public Service Commission of South Carolina (“the Commission”) to shorten the time by which LEI must respond to interrogatories and to require responses on or before October 1<sup>st</sup>, 2021.

LEI opposes CCEBA’s Motion, which was filed earlier today, as it is inconsistent with the terms and conditions under which LEI accepted the engagement, and is also contrary to Section 103-833 of the South Carolina Code of State Regulations which allows 20 days for a response. While LEI will make good faith efforts to reply promptly, it cannot guarantee that it will be able to comply with the radically curtailed timeline which is proposed.

For these reasons, LEI respectfully urges the Commission to reject CCEBA’s Motion. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "AJ Goulding". The signature is stylized with a large, looped "G" and a long horizontal stroke extending to the right.

AJ Goulding  
President  
[ajg@londoneconomics.com](mailto:ajg@londoneconomics.com)